

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GREAT AMERICAN E & S INSURANCE
COMPANY, INDIVIDUALLY, AND AS
ASSIGNEE OF CLAIMS FROM ITS
INSURED C3 MANUFACTURING LLC, A
COLORADO COMPANY,

Plaintiff,

v.

HOUSTON CASUALTY COMPANY,
GORDON REES SCULLY MANSUKHANI,
LLP, SINARS SLOWIKOWSKI TOMASAKA
LLC, J. SCOTT WOOD and CHRISTOPHER
FURMAN,

Defendants.

Case No. 2:23-CV-01695

DECLARATION OF STEVEN P. CAPLOW
IN SUPPORT OF NOTICE OF REMOVAL

Steven P. Caplow declares:

1. I am an attorney at Davis Wright Tremaine LLP and counsel of record for Defendant Houston Casualty Company ("HCC") in this action. I submit this declaration in support of HCC's Notice of Removal based on my review of the files and records in this case. I am over 18 years of age and in all other ways competent to testify to the facts in this declaration.

2. Attached as **Exhibit A** is a true and correct copy of the Summons filed in King County Superior Court on September 5, 2023.

3. Attached as **Exhibit B** is a true and correct copy of the Case Information Cover Sheet filed in King County Superior Court on September 5, 2023.

4. Attached as **Exhibit C** is a true and correct copy of the Complaint filed in King County Superior Court on September 5, 2023.

5. Attached as **Exhibit D** is a true and correct copy of the Order Setting Civil Case Schedule issued by the King County Superior Court on September 5, 2023.

6. My firm has conducted a reasonable inquiry into the citizenship of Great American E & S Insurance Company ("GAES"). GAES alleges in its complaint that it is an Ohio corporation with its principal place of business in Cincinnati, Ohio.

7. HCC is a corporation incorporated under the laws of Texas with its principal place of business in Houston, Texas.

8. No earlier than November 6, 2023, a copy of the Summons and Complaint was delivered to HCC's registered business address.

I declare the foregoing is true and correct to the best of my knowledge under penalty of perjury.

SIGNED at Seattle, Washington this 6th day of November, 2023.

s/ Steven P. Caplow

Steven P. Caplow, WSBA #19843

stevenaplow@dwt.com

CERTIFICATE OF SERVICE

I hereby certify that on 6th day of November, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the below attorney of record for plaintiff.

Mark Johnson, WSBA No. 8463
Michael Sprangers, WSBA No. 45501
JOHNSON FLORA SPRANGERS PLLC
2001 Western Ave., Suite 205
Seattle, WA 98121
206-386-5566
mark@johnsonflora.com
michael@johnsonflora.com

Attorneys for Great American E & S Insurance Company

DATED this 6th day of November, 2023.

By s/ Everett W. Jack, Jr.
Everett W. Jack, WSBA No. 47076
Steven P. Caplow, WSBA No. 19843